

Peter Goldstein [SBN 6992]
PETER GOLDSTEIN LAW CORP
peter@petergoldsteinlaw.com
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 474-6400
Facsimile: (888) 400-8799

Attorney for Plaintiffs
SONIA ESPARZA, an individual
and as special administrator of the Estate of
FERNANDO MARTINEZ, JR.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SONIA ESPARZA, individually, and as
SPECIAL ADMINISTRATOR of the Estate
of FERNANDO MARTINEZ, JR.,

Plaintiffs,

v.

WELLPATH, LLC F/K/A CORRECT
CARE SOLUTIONS, LLC; LAS VEGAS
METROPOLITAN
POLICE DEPARTMENT,
and DOES 1 through 10, inclusive,

FERNANDO MARTINEZ SANTOS
Nominal Defendant.

Defendants.

Case No.: 2:23-cv-02161 GMN-MDC

STIPULATION AND PROPOSED
ORDER REGARDING EXTENDING
THE TIME FOR PLAINTIFF TO FILE
HER OPPOSITION TO WELLPATH
LLC 'S MOTION TO DISMISS
PLAINTIFF'S FIRST AMENDED
COMPLAINT PURSUANT TO FRCP
12 (b)(6)

Plaintiff Sonia Esparza and Defendants Wellpath, LLC f/k/a Correct Care Solutions, LLC and Las Vegas Metropolitan Police Department hereby stipulate and agree as follows.

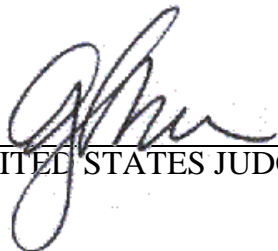
The parties agree on the following facts for purposes of this stipulation and order:

Wherefore, the parties stipulate and agree as follows:

1. On May 9, 2024, Defendant, Wellpath LLC filed a Motion to Dismiss Plaintiff's First Amended Complaint Pursuant to FRCP 12 (b)(6).

2. The Opposition deadline for their Motion is May 23, 2024.
3. Local Rule IA 6-1 governs the parties' Stipulation requesting an extension of these briefing deadlines. Plaintiff's counsel is requesting this extension because he is engaged in numerous other cases that have pending deadlines for discovery and trial, one of which he is co-counsel, Childress v LVMPD set for trial on June 17, 2024, a joint pretrial order on another federal court case and a preplanned trip to Chicago next week.
4. The parties stipulate and agree that good cause exists to extend the deadlines for Plaintiff's opposition to the Defendant Wellpath, LLC's Motion to Dismiss Plaintiff's First Amended Complaint Pursuant to FRCP 12 (b)(6).
5. For these reasons, the parties respectfully request that the Court extend the briefing deadlines as follows: Plaintiff's Opposition to Defendant WELLPATH, LLC's motion to dismiss will become due on **June 6, 2024**.
6. The parties stipulate and agree that this extension will not create an unnecessary delay to resolution of this case. The extension will ensure that the parties can prepare adequate briefs for the Court to make a ruling on the merits.

IT IS SO ORDERED.


UNITED STATES JUDGE

DATED: May 17, 2024

1 PETER GOLDSTEIN LAW CORP

2 /s/ Peter Goldstein

3 Peter Goldstein, Esq. (Bar No. 6992)

10161 Park Run Drive, Suite 150

4 Las Vegas, Nevada 89145

5 *Attorney for Plaintiffs*

6 HALL & EVANS, LLC

7 /s/ Yuliya Brady

Adam R. Knecht, Esq. (Bar No. 13166)

8 Yuliya Brady, Esq. (Bar No. 14699)

1160 North Town Center Drive, Suite 330

9 Las Vegas, Nevada 89144

10 *Attorneys for Defendant Wellpath, LLC*

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